

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

George Gatlin,)	
)	
Plaintiff,)	
)	
v.)	
)	No. 07 C 7212
P.O. A. Criscione, Star #16195,)	
P.O. S. Mulkerrin, Star # 17071,)	Honorable Joan Humphrey Lefkow
Anthony Caputo, individually, and)	
The City of Chicago, S&H Towing,)	
and Bill Kay Chrysler,)	
Defendants.)	

**OGDEN CHRYSLER PLYMOUTH INC.'S
MOTION FOR LEAVE TO ADOPT ITS MOTION
TO STAY AND COMPEL THE ARBITRATION OF THE
CLAIMS IN PLAINTIFF'S COMPLAINT, AS ITS MOTION TO
STAY AND COMPEL ARBITRATION OF THE AMENDED COMPLAINT**

Defendant, Ogden Chrysler Plymouth, Inc., sued herein as Bill Kay Chrysler ("Bill Kay"), by and through its attorneys, Gordon & Karr LLP, moves this Court for the for leave to adopt its motion to stay and compel the arbitration of plaintiff's complaint (and its supporting reply memorandum) as its motion (and supporting reply memorandum) to stay and compel the arbitration of the claims raised in plaintiff's first amended complaint, and in support thereof states as follows:

1. Plaintiff's original complaint named Bill Kay Chrysler as a defendant. In lieu of an answer, Bill Kay Chrysler filed a motion to stay and compel the plaintiff to submit the claims set forth in that complaint against Bill Kay Chrysler to arbitration pursuant to an Arbitration Agreement executed by plaintiff. Bill Kay subsequently filed a reply memorandum in support of that motion.

2. Plaintiff has now filed an amended complaint which added new defendants. However, the claims against Bill Kay Chrysler remain the same.

3. Bill Kay Chrysler seeks to have its motion (and supporting reply memorandum) to stay and compel the arbitration of the claims made in plaintiff's complaint stand as its motion (and supporting reply memorandum) to stay and compel the arbitration of the claims made against it in plaintiff's amended complaint.

WHEREFORE, for the foregoing reasons Ogden Chrysler Plymouth, Inc., d/b/a Bill Kay Chrysler, moves this Court for the entry of an order granting it leave to adopt its motion to stay and compel the arbitration of plaintiff's complaint (and its supporting memorandum), as its motion (and supporting memorandum) to stay and compel the arbitration of the claims made in plaintiff's first amended complaint.

Ogden Chrysler Plymouth, Inc.,
d/b/a Bill Kay Chrysler,
Defendant,

By: S/Stuart D. Gordon
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